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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARLOS E. KEPKE,

Defendant.

Criminal No. 3:21-CR-00155-JD

UNITED STATES PROPOSED FORM
OF VERDICT

The United States of America, by and through undersigned counsel, hereby respectfully submits
the attached proposed verdict form for use in the above-captioned case.

STEPHANIE M. HINDS
United States Attorney

s/ Michael G. Pitman
MICHAEL G. PITMAN
Assistant United States Attorney
COREY J. SMITH
Senior Litigation Counsel

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARLOS E. KEPKE,

Defendant.

Criminal No. 3:21-CR-00155-JD

VERDICT

WE, THE JURY, in this case, unanimously find the Defendant **Carlos E. Kpke**:

COUNT 1: _____ (guilty/not guilty) of the offense of conspiracy to defraud the United States by obstructing the lawful functions of the Department of the Treasury, Internal Revenue Service, by deceitful or dishonest means, in violation of Section 371 of Title 18 of the United States Code, as charged in Count One of the Indictment.

1 **COUNT 2:** _____ (guilty/not guilty) of the offense of willfully aiding,
2 assisting and counseling the preparation and presentation of a false income tax return for the year 2012
3 in violation of Section 7206(2) of Title 26 of the United States Code, as charged in Count Two of the
4 Indictment.

5
6 **COUNT 3:** _____ (guilty/not guilty) of the offense of willfully aiding,
7 assisting and counseling the preparation and presentation of a false income tax return for the year 2013
8 in violation of Section 7206(2) of Title 26 of the United States Code, as charged in Count Three of the
9 Indictment.

10
11 **COUNT 4:** _____ (guilty/not guilty) of the offense of willfully aiding,
12 assisting and counseling the preparation and presentation of a false income tax return for the year 2014
13 in violation of Section 7206(2) of Title 26 of the United States Code, as charged in Count Four of the
14 Indictment.

15
16
17 Dated: _____

FOREPERSON